

Community Consultation Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Toni

Family Name *

Batey

Organisation (if applicable)

Lions club of seaward Kaikōura

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Within our township we have very few bars and those that do are predominantly eateries. They are struggling enough without having to add more barriers. Keeping the status quo seems enough.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

Community Consultation Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Toni

Family Name *

Batey

Organisation (if applicable)

Kaikōura A&P Show

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

We are such a small town, when you restrict an event based on its location to a school our small area, it doesn't equate...we have a school in the heart of town, across the rd from our only park / domain. This is one of two sites to hold events and the other (our domain in sth bay has a preschool on its grounds) ...this addition to the LAP policy is not for our town. Especially when the events are outside of school or preschool hours.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Ruth

Family Name *

Berry

Organisation (if applicable)

Wine Marlborough

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Please see detailed submission sent by email to submissions@kaikoura.govt.nz

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☒ Yes ☐ No

A. Submitter Contact Details

First Name *

James

Family Name *

Bishop

Organisation (if applicable)

New World KAIKŌURA

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

As stated in the draft proposal, there has been no evidence that starting liquor sales from 9am would have any benefit towards the minimising of alcohol-related harm in our community as compared with an 8am start. We understand there have been no local studies into whether the change in selling times in Kaikōura would produce any different outcomes.

However, a change to the start time from 8-9am would have a significant business impact for us and the way our business is able to operate in the morning. For this reason, we oppose changing the maximum selling times to 9am-9pm.

We look forward to an opportunity to speak to this at the hearing,

Thanks, James and Kym Bishop

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☒ Yes ☐ No

Community Consultation Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Lisa

Family Name *

Bond

Organisation (if applicable)

Destination Kaikoura

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Paula

Family Name *

Cumming

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Leave it as is.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Susanne

Family Name *

Dunnett

Organisation (if applicable)

Strawberry Tree Kaikoura Ltd

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Additional Comments

From a hospitality business perspective, we ask the Council to consider the following:

Confirm that no cap on the number of off-licences will be introduced through this review. Licensing applications should continue to be considered on their individual merits through the existing licensing process rather than through an arbitrary numerical limit.

Retain one-way door restrictions as a discretionary condition only, applied where there is clear evidence relating to an individual premises. A blanket or mandatory approach could create unnecessary operational difficulties for responsible hospitality businesses without necessarily addressing the circumstances giving rise to alcohol related harm.

Confirm that established host responsibility practices are an acceptable approach within an Alcohol Management Plan rather than imposing a standard two drinks per purchase limit. Hospitality operators and licensed managers require sufficient flexibility to responsibly manage service according to the nature of an event, the customers involved and the circumstances at the time.

Provide clear practical guidance on alternative arrangements that may be accepted in place of certified crowd control officers under Policy 2.4. This would give responsible operators greater certainty when planning events while allowing appropriate arrangements to reflect the nature, size and risk profile of individual venues and events.

Clarify how the 400 person attendance threshold will be assessed, particularly whether it is based on the maximum number of people on site at any one time, total attendance throughout an event or ticket sales. Our preferred approach would provide sufficient flexibility for more than 400 people to attend over the duration of an event where no more than 400 are present at any one time without automatically triggering unnecessary additional compliance requirements. We believe a flexible approach is particularly appropriate for well established compliant venues with a demonstrated history of responsible management. A one size fits all approach does not necessarily reflect the nature of individual venues, events or their actual risk profile.

Retain unchanged the Commercial Zone exemption and the existing premises and renewal carve out contained in Policy 4.2. This recognises established hospitality businesses and commercial areas where licensed premises would reasonably be expected to operate.

Overall, we believe these amendments and clarifications would provide greater certainty for hospitality operators while maintaining the Council's objectives around responsible alcohol management and harm minimisation.

We appreciate the opportunity to contribute to the consultation process.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026*

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

Community Consultation Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Kevin

Family Name *

Genet

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Dorothy

Family Name *

Halliday

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Judith

Family Name *

Jarvis

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

Community Consultation

Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Jane

Family Name *

Nelson

Organisation (if applicable)

R & J Nelson Ltd

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Douglas

Family Name *

OCallahan

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

Community Consultation

Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Diane

Family Name *

Rossiter

Organisation (if applicable)

Seaward Lions

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Justine

Family Name *

Schroder

Organisation (if applicable)

A&P show committee

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

The A&P committee have no other comments regarding the other LAP proposed changes.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☒ Yes ☐ No

A. Submitter Contact Details

First Name *

Justine

Family Name *

Schroder

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Proposal: Supporting Innovative Tourism Tasting Experiences in Kaikōura

Kaikōura's tourism sector continues to grow, creating opportunities to offer visitors unique and memorable experiences that showcase the best of our region. Through ongoing discussions with local tourism operators, there is increasing interest in collaborating to combine our distinctive attractions into high-quality visitor experiences.

Over recent years, I have seen a significant increase in requests to integrate our distillery experiences with other tourism activities. These experiences are designed to educate visitors about our products, the distillation process, local stories, and responsible alcohol consumption. They take place in highly controlled environments where the emphasis is on learning, quality, and enjoyment rather than alcohol consumption.

Currently, every time we wish to offer a tasting experience outside the parameters of our existing licence, we are required to obtain a Special Licence. For example, I am currently applying for a Special Licence to host a "Gin Experience" for a group of 19 people. The event will allow participants to sample small quantities of our gins and liqueurs while learning about the history of the products, the production process, and the importance of responsible drinking. Experiences such as combining an EcoZip adventure with a guided tasting create unique tourism offerings that visitors increasingly

seek.

While I fully support the Sale and Supply of Alcohol Act, its focus on harm reduction, and the responsibilities associated with the safe sale and supply of alcohol, I believe the current licensing requirements create unnecessary administrative workloads for both applicants and regulatory agencies when applied to small, educational tasting experiences. These events are low risk, carefully managed, and centred on education rather than consumption.

I propose that, as Kaikōura continues to develop as a tourism destination, consideration be given to a more practical pathway for delivering such experiences. This could involve a streamlined approval process where operators notify relevant authorities of the event details, including location, timing, participant numbers, and safety measures, while still maintaining full accountability and compliance with responsible service requirements.

This approach would allow operators to respond more effectively to visitor demand while ensuring experiences remain safe, controlled, and aligned with the objectives of the Act.

The Government has already signalled interest in modernising aspects of alcohol legislation, creating an opportunity to explore innovative licensing solutions that reflect contemporary tourism and hospitality practices. I have been working closely with Kaikōura's liquor licensing authorities to improve understanding that tasting experiences are primarily educational experiences, not drinking events.

There is growing support for this perspective among tourism operators, and organisations such as Wine Marlborough are also advocating at a national level for licensing frameworks that prioritise harm reduction while enabling greater collaboration and the development of premium wine and spirits tourism experiences. By working together, we can create a regulatory approach that both protects communities and supports the continued growth and success of Kaikōura's tourism industry.

Key Outcome Sought

A more flexible and efficient licensing process for small-scale, educational tasting experiences that supports tourism innovation while maintaining strong standards for responsible alcohol service and harm prevention.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026*

Five minute slots will be allocated to each person who wishes to present their submission in person.

☒ Yes ☐ No

Submission on the Draft Local Alcohol Policy 2026

2 October 2026

Tēnā koutou katoa

Thank you for the opportunity to provide feedback on the draft Local Alcohol Policy.

Esses Wine and Wine Marlborough support the revised Alcohol Policy with limited amendments.

We would like to present our feedback in person to the Hearing Panel at Council 21 October 2016.

Executive Summary

We support the proposed Local Alcohol Policy in principle as it is consistent with our industry and its contribution to the Kaikōura District economically through the provision of premium tourism experiences.

We do have some suggestions to improve the clarity of the policy and to ensure that the special character of premium products and experiences of local producers such as Esses are recognised.

Our proposed amendments and a brief rationale are detailed by document section below.

Background

We suggest the addition of a sentence that notes that Kaikōura is home to award-winning locally made beers, wines and spirits. This addition maintains a consistency between the LAP and *Moving Kaikōura Forward*, the Kaikōura District Council Long-Term Plan 2024 – 2034.

Policy Objectives

We are supportive of the policy objective and the broader community outcomes:

- Promote community safety
- Minimise alcohol-related harm across all areas
- Ensure responsible sale, supply, and consumption of alcohol.

To add context to our submission we would also note that members of NZ Winegrowers, including Esses take seriously their responsibilities in responsible and safe sale and supply of alcohol. To support this New Zealand Winegrowers have developed the Code of Conduct for the Responsible Online Sale and Delivery of Alcohol, a copy of which is included with this submission.

We request that the broader community outcome, *'Reflect the district's changing character'* be amended to improve the clarity and intent of the outcome. Kāikōura is part of the internationally renowned premium wine region delineated by the Marlborough Geographic Indication. Esses is within the GI and is an award-winning winery, producing premium methode traditionnelle sparkling wine and hosting uniquely tailored tasting and tourism experiences, in conjunction with other Kāikōura businesses. Offerings such as these diversify Kāikōura's tourism

We suggest the following amended wording and additional community outcome:

- Reflect the district's diversity, distinct communities and unique characteristics of our district.
- Maintain an appropriate balance between economic activity, social wellbeing, and the special character of Kāikōura.

Definitions

To support the intent of the proposed LAP and to improve clarity we suggest the following amendments and additions:

Bottle store (amend)	A retail premises where (in the opinion of the licensing authority or licensing committee concerned) at least 85% of the annual sales revenue is expected to be earned from the sale of alcohol for consumption somewhere else, and where the retail offer consists of a wide range of mainstream packaged alcoholic beverages. A bottle store does not include: • Producer-based premises (such as tap rooms or cellar doors) where takeaway alcohol is limited to products made on-site or sourced from a single local producer or a small group of local producers; • Specialty or boutique alcohol retailers that sell a curated or limited selection of products rather than a broad, general retail range.
Cellar Door (add)	<i>means retail premises where grape wine is available for supply, which has principally been made —</i> <i>on the premises; or</i> <i>from produce harvested from land on which, or in proximity to which, the premises are situated; or</i> <i>by or on behalf of the holder of any licence for the premises.</i>

Commercial Zone (add)	As shown in the Kaikōura District Plan
Conveyance (add)	Means an aircraft, coach, ferry, hovercraft, ship, train or other vehicle, used to transport people; and includes part of a conveyance.
Licensed premises (add)	Means any premises for which a licence is held.
Off License (add)	Licensed for the sale of alcohol from the premises for consumption elsewhere. Licensed for the sale of alcohol on or from the premises for delivery elsewhere. Also permitted to supply alcohol as a sample (of up to 35mL), for consumption on the premises for consumption on the premises. <i>Remote sales-endorsed:</i> Licensed for the sale of alcohol on or from the premises for delivery elsewhere. <i>Auctioneers-endorsed:</i> Licensed to sell alcohol by auction.
On License (add)	Licensed for the sale and supply of alcohol on the premises and can permit alcohol to be consumed on the premises. <i>BYO-endorsed:</i> licensed for the consumption of alcohol to anyone who is on the premises for dining. <i>Caterers-endorsed:</i> in addition to the definition above for on-licenses, a caterer can also deliver alcohol from their premises and sell it on any other premises for consumption there by people attending a reception, function or other social-gathering.
Sensitive Site (add)	Any early childhood centre / kindergarten, school, kohanga reo, kura kaupapa, healthcare facility, Marae, place of worship, or facility considered by the District Licensing Committee / Alcohol Regulatory and Licensing Authority to be where children, youth or vulnerable populations would gather.
Special License (add)	<i>Off-site special license:</i> Licensed for the sale or supply of alcohol for consumption elsewhere. The licensee is also able to supply alcohol as a sample (up to 35mL), for consumption on the premises. <i>On-site special license:</i> Licensed for the sale or supply of alcohol for consumption there, to people attending an event described on the license.

Policy

Policy 1: Maximum Permitted Trading Hours

We support the intent of Policy to reduce alcohol harm. However, as it is currently written it restricts opportunities for unique tourism opportunities such as “dark-sky” or sunrise tasting experiences”

Astro-tourism is a key area of tourism diversification for Kaikoura. The night sky and cosmos are key elements in biodynamics and influence the vineyard throughout the growing season along with the development of the flavour profiles within the grapes. Longer trading hours allows for dark sky tastings in peak summer along with the opportunity for sunrise and moon-setting tastings in the morning. This expands the tourism offering for Kaikoura, allowing tourists to take full advantage of day and nighttime tourism activities.

Policy 1.1 On-licences

Esses Estate supports in principle the policy for on-licence conditions.

Hospitality is key part of our tourism offerings and the current closing hours allows venues to stay open to cater for a wider variety of guests including those that dine later, after a days activities or participating in night time activities.

Policy 1.2 Off-licenses

We request changes to the proposed policy for off-licenses to better reflect the diversity, and associated differences in risk profile, of off-licence venue types. Specifically we suggest that:

- POLICY 1.2 does not apply to producer-based premises (such as tap rooms or cellar doors) where takeaway alcohol is limited to products made on-site or sourced from a single local producer or a small group of local producers.
- Insert Policy 1.3 Off-licenses (producer-based premises).
The maximum permitted trading hours in the Kaikōura district for producer-based premises is **Monday to Sunday 5:15am to 11:59pm**

Commented [RB1]: Mel I have made the earliest time 5:15am to allow for sunrise tasting experiences

Policy 2: Special Licenses

Esses Estate supports in principle the policy for special licences.

Policy 3: Discretionary conditions

Esses Estate supports in principle the policy for discretionary conditions

Policy 4: Location of Licensed Premises

Policy 4.1 Sensitive sites New on-license and off-license

We suggest that this policy should be amended to exclude supermarkets/grocery stores, hotels, cellar doors, special licences, or remote sales only off licenses as these are either premises that did not focus completely on the sale of alcohol, where there would be no exposure of the alcohol to customers or where sale of the product was a result of the manufacture of alcohol on site.

Other matters related to location of licensed premises.

We suggest that consideration is given to adding a policy 4.3 that places a limit or cap on the

number of off-license bottle store Licenses (no more or a specified number of new). The limit or cap does not include the following types of premises:

- cellar doors;
- hotels;
- supermarket/grocery stores;
- remote sales only Off-license; and
- premises where the alcohol being sold is manufactured on site or made from ingredients grown on-site.

Policy 5: Adoption of the policy

Policy 5.2 Review

Esses Estate supports in principle the proposed policy review process.



Mel Skinner
Director
Esses Estate

Community Consultation

Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Craig

Family Name *

Smith

Organisation (if applicable)

Liquorland Kaikoura

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☒ Yes ☐ No

Community Consultation

Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Julie

Family Name *

Syme

Organisation (if applicable)

Kaikoura Seaward Lions Club

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Melville

Family Name *

Syme

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

Community Consultation

Local Alcohol Policy 2026



A. Submitter Contact Details

First Name *

Alison

Family Name *

Taylor

Organisation (if applicable)

Kaikoura Seaward Lions

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

A. Submitter Contact Details

First Name *

Naemi

Family Name *

Ueda

Organisation (if applicable)

Do you support the revised Local Alcohol Policy?

Select the option you support

- ☐ Option 1 - Yes
- ☐ Option 2 - Yes, with limited amendments
- ☐ Option 3 - No

If you only support the policy with limited amendments, what are those amendments?

Do you have any other comments on the draft Class 4 Gambling Venue Policy?

Type in your comments here

500 word limit.

Do you want to add additional comments about the Local Alcohol Policy?

Do you have any other comments on the Local Alcohol Policy?

☐ Yes ☐ No

Type in your comments here

500 word limit.

Big crowd how hard we try to control people do what they want to do. Organizers should not put on responsibility for alcohol control. That's police's job area.

How many certified crowd control officers is in Kaikōura. if need to employing people with certification would Kaikoura District Council support the costs. so many events in this town run by budget another top of it spending things would not work should not be created.

D. Hearings

Do you want to present your feedback in person to the Hearing Panel at Council on 21 October 2026 *

Five minute slots will be allocated to each person who wishes to present their submission in person.

☐ Yes ☒ No

2 October 2026

Kaikōura District Council
PO Box 6
Kaikōura
7340

Tēnā koutou

Technical Advice on the Kaikōura Local Alcohol Policy 2026

1. This technical advice has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island, including Kaikōura District.
2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Healthy Futures (Pae Ora) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health | Manatū Hauora definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.¹

5. This technical advice sets out matters of interest and concern to NPHS Te Waipounamu, and information included is based on evidence about public health and equity.
6. We welcome the opportunity to comment on the Kaikōura Local Alcohol Policy 2026. We appreciate the opportunity to provide early feedback in June; this document reiterates some of our early feedback and makes some further recommendations.

¹ Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. <https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity>

General Comments

7. Health and wellbeing are influenced by a wide range of factors beyond the health sector. These factors are often referred to as the 'social determinants of health', and can be described as the environmental, economic and social conditions in which people are born, grow, live, work and age.² Health and wellbeing are also impacted by commercial determinants of health, including the sale and supply of alcohol.
8. The diagram³ below illustrates that these determinants of health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government, if they are to have a collective impact.⁴ Local government has a role in reducing the harm caused by the availability and accessibility of alcohol.

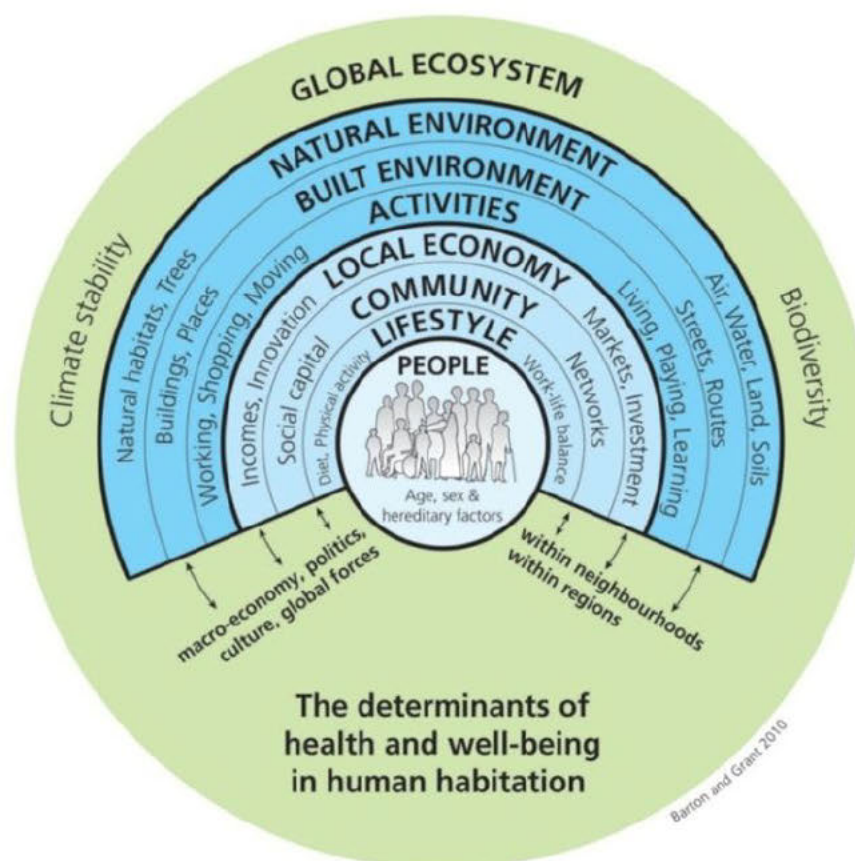


Figure 1: Social determinants of health

² Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee.
https://mohlibrary.softlinkhosting.co.nz/443/liberty/OpacLogin?mode=BASIC&openDetail=true&corporation=default_corp&action=search&queryTerm=uuid%3D%225e0914be0a5a01e27fdf294000051624%22&editionUuid=5e0914be0a5a01e27fdf294000051624&operator=OR&url=%2Fopac%2Fsearch.do

³ Barton, H. & Grant, M. (2006). A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health*, 126(6), 252-253.
<https://journals.sagepub.com/doi/10.1177/1466424006070466>

⁴ McGinnis J.M., Williams-Russo P. & Knickman JR. (2002). The case for more active policy attention to health promotion. *Health Affairs*, 21(2), 78-93.
<https://www.healthaffairs.org/doi/abs/10.1377/hlthaff.21.2.78>

9. NPHS Te Waipounamu acknowledges the process undertaken by Council to ensure that the local community and stakeholders have had opportunities to engage in the review of the Local Alcohol Policy (LAP). LAPs can give communities more say on access to alcohol in their district and have the potential to help reduce alcohol harm.
10. As highlighted in our earlier feedback, alcohol is a significant health, social and justice issue in Aotearoa New Zealand. The harm caused by alcohol is estimated to cost \$9.1 billion each year, with almost half of this figure (\$4.8 billion) attributed to foetal alcohol spectrum disorder (FASD).⁵
11. Alcohol harm is an equity issue. Men, Māori, disabled people and those experiencing economic deprivation are more likely to report hazardous drinking.⁶ Māori are twice as likely to die from alcohol-related causes compared to non-Māori.⁷ People living in the most socio-economically deprived areas are also at greater risk of harm from alcohol, yet are more exposed to off-license premises, having three times as many per population compared to the least deprived areas.^{8 9}
12. Alcohol is the most harmful drug in society when considered in relation to its harm both to the user and to others. Alcohol is considered the most harmful because of its causal association with a large number of diseases, including cancers, psychological disorders and other medical conditions. Research shows that, in 2018, alcohol was attributable for an estimated 1,250 cancers in Aotearoa New Zealand. Breast cancer and bowel cancer made up 69% of all alcohol-attributable cancers.¹⁰ Māori experience a higher burden of alcohol-related cancers. In 2012, Māori lost an average of 12.7 years of life from alcohol-attributable cancers compared with 10.1 years for non-Māori.¹¹
13. Alcohol also causes more harm to others than to those who use it, including families, friends, communities and wider society. Research in Aotearoa New Zealand estimated that 78,277 healthy life years were lost in 2018 due to alcohol's harm to others, which is a greater estimated burden than for drinkers themselves. This figure was based on the estimated number of years of healthy life lost due to either living with disability or to premature deaths. The main contributor was FASD (which negatively affects a person's life, education and employment prospects), followed by traffic crashes and interpersonal violence. The same study found that Māori suffer harms related to others' use of alcohol at a higher rate than non-Māori.¹²
14. We commend Council for adopting some of the recommendations that we provided through the early engagement process. We have recommendations on how to strengthen the Local Alcohol Policy.

⁵ NZIER. (2024). Costs of alcohol harms in New Zealand: Updating the evidence with recent research. A report for the Ministry of Health. Accessed from: <https://www.health.govt.nz/publications/costs-of-alcohol-harms-in-new-zealand-updating-the-evidence-with-recent-research>

⁶ Ministry of Health. (2026). *New Zealand Health Survey. Annual Data Explorer*. Accessed from: <https://www.health.govt.nz/monitoring-statistics/surveys/new-zealand-health-survey>

⁷ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892/1

⁸ Randerson S, Wright K, Connor J. (2024). Local alcohol policies: What's the opportunity to reduce harm. Public Health Communication Centre Aotearoa. 23 October. Accessed from: <https://www.phcc.org.nz/briefing/local-alcohol-policies-whats-opportunity-reduce-harm>

⁹ Chambers, T., Mizdrak, A., Herbert, S., & Jones, A. C. (2023). Interventions to reduce alcohol's harms to health: a modelling study. Wellington: Te Whatu Ora – Health New Zealand. Accessed from: <https://www.health.govt.nz/publications/interventions-to-reduce-alcohol-harms-to-health-a-modelling-study> - University of Otago

¹⁰ Chambers T., Mizdrak A., Jones A.C., Davies, A. Sherk, A. (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Wellington, New Zealand. Accessed from: https://healthnz.figshare.com/articles/report/Estimated_alcohol-attributable_health_burden_in_Aotearoa_New_Zealand/27048892/1

¹¹ Connor, J., Kydd, R., MacLennan, B., Shield, K., & Rehm, J. (2017). Alcohol-attributable cancer deaths under 80 years of age in New Zealand. *Drug and alcohol review*, 36(3), 415-423.

¹² Casswell, S., Huckle, T., Romeo, J. S., Moewaka Barnes, H., Connor, J., & Rehm, J. (2024). Quantifying alcohol-attributable disability-adjusted life years to others than the drinker in Aotearoa/New Zealand: a modelling study based on administrative data. *Addiction*, 119(5), 855-862.

Trading Hours

15. We strongly recommend that Council reduces trading hours for both on-licenses and off-licenses. We do not support retaining the existing trading hours of 8:00am-2:00am for on-licenses and 8:00am-10:00pm for off-licenses.
16. As stated in our earlier feedback, there is strong international evidence that shows changes in hours of trade have a significant impact on the volume of alcohol consumed and rates of alcohol-related problems. This research shows that when hours of sale are increased, alcohol consumption and related harms increase and vice versa.¹³ A systematic review of studies found that restricting trading hours of both on- and off-licence premises was typically followed by decreases in the incidence of alcohol-related harm in the form of assault and hospitalisation.¹⁴

Off-licenses

17. NPHS Te Waipounamu strongly recommends reducing the trading hours for all off-licence retailers to 9:00am-9:00pm.
18. The Supreme Court's 2023 ruling on Auckland Council's Provisional LAP indicated that a 9:00pm closing time (for off-licence premises) was not unreasonable in light of the object of the Sale and Supply of Alcohol Act 2012. The Court also found that the Alcohol Regulatory and Licensing Authority had extensively reviewed the evidence, which indicated that changing the closing time to 9:00pm was likely to reduce alcohol-related harm.¹⁵
19. Reducing maximum trading hours for off-licenses to 9:00pm is in line with a number of other councils including Hurunui District, Selwyn District, Mackenzie-Timaru-Waimate Districts, Christchurch City, Auckland, Central Hawkes Bay District, Gisborne District, Hastings District, Matamata-Piako District, Porirua District, Rotorua Lakes District, Thames Coromandel District, Wairoa District, and Whanganui District. Hauraki District Council's LAP has an off-licence closing time of 8:00pm.
20. Furthermore, we recommend reducing the maximum trading hours of off-licenses to bring the LAP in line with some off-licenses that are currently open fewer hours than the LAP currently allows. For example, New World Kaikoura closes at 8:00pm, Liquorland Kaikoura closes between 7:00pm and 9:00pm and Super Liquor Kaikoura closes between 9:00pm and 10:00pm. Therefore, reducing trading hours for off-licenses may have little to no impact on these businesses.

Location Restrictions

21. NPHS Te Waipounamu supports the proposal to restrict new licences within 100 metres of sensitive sites outside the Commercial Zone. We recommend that a map of the Commercial Zone is included in the LAP to clarify the areas that are exempt from this restriction.
22. We support applying this restriction to schools, early childhood education facilities, marae, churches or other places of regular worship, alcohol and drug treatment facilities and social service providers delivering services to vulnerable persons.

¹³ Babor, T. F., Casswell, S., Graham, K., Huckle, T., Livingston, M., Österberg, E., ... & Sompaisam, B. (2022). *Alcohol: no ordinary commodity: research and public policy*. Oxford: Oxford University Press.

¹⁴ Nepal, S., Kypri, K., Tekelab, T., Hodder, R. K., Attia, J., Bagade, T., ... & Miller, P. (2020). Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review. *Journal of studies on alcohol and drugs*, 81(1), 5-23.

¹⁵ Supreme Court of New Zealand. (2023). *Woolworths New Zealand Limited v Auckland Council*. 5 May 2023.

<https://www.courtsfnz.govt.nz/assets/cases/2023/MR-2023-NZSC-45.pdf>

23. NPHS Te Waipounamu recommends that this restriction is also applied to recreational facilities, including community facilities, playgrounds, parks and reserves, because these sites are often used by families and children. We also recommend that location restrictions are applied to health care facilities to protect users of these facilities.
24. We recommend that kohanga reo and kura kaupapa are included in the definitions of early childhood facilities and schools.
25. There is a strong association between alcohol outlet proximity and alcohol harm (increased proximity is associated with increased harm).¹⁶ Adopting proximity controls around sensitive sites will help to reduce exposure to alcohol advertising and consumption and reduce accessibility of alcohol for vulnerable population groups that frequent sensitive sites. Protecting users of sensitive sites can assist in addressing their disproportionate and inequitable exposure to alcohol and experience of alcohol harms.

One-Way Door Restrictions

26. NPHS Te Waipounamu encourages Council to adopt mandatory one-way door restrictions across all on-license establishments. We support Police's position that one way door restrictions should apply to all on-licence venues from 12:00am with closure at 1:00am.

Special Licenses and Large Events

27. NPHS Te Waipounamu supports strengthening the requirements for large events. We acknowledge Council for adopting the proposal to require special licenses with more than 400 people to produce an alcohol management plan. This requirement can support organisers to manage risks effectively, improve event safety, and reduce alcohol-related harm.

Other recommendations

28. NPHS recommends that the LAP prohibits alcohol advertising and signage at licensed premises. Research has found there is a causal relationship between alcohol marketing and drinking among young people.¹⁷ Young people's exposure to alcohol advertising is associated with earlier uptake of drinking and heavy drinking among adolescents who already drink.^{18 19}
29. NPHS recommends that club-licenses are required to have a duty manager on-site at all times, the same as on-licenses, to ensure that the premises comply with the Sale and Supply of Alcohol Act 2012 and the conditions of the alcohol licence.

¹⁶ Hobbs, M., Marek, L., Wiki, J., Campbell, M., Deng, B. Y., Sharpe, H., ... & Kingham, S. (2020). Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*, 65, 102397.

¹⁷ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

¹⁸ Anderson, P., De Bruijn, A., Angus, K., Gordon, R., & Hastings, G. (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol & Alcoholism*, 44(3), 229-243.

¹⁹ Jernigan, D., Noel, J., Landon, J., Thornton, N., & Lobstein, T. (2017). Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*, 112, 7-20.

30. We recommend that the LAP prohibits same-day deliveries of alcohol after 9:00pm. This restriction would assist in countering the ability of off-licences to continue fulfilling remote sales orders for delivery up to 11:00pm despite being required to close their doors earlier.
31. We recommend that the LAP prohibits the use of 'buy now, pay later' (BNPL) services at licenced premises. BNPL services increase the economic accessibility of alcohol and may lead to increased alcohol use and harm, as well as financial hardship for vulnerable populations.^{20 21}

Conclusion

32. NPHS Te Waipounamu wishes to be heard with respect to this technical advice.

Ngā mihi,



Vince Barry

Regional Director
National Public Health Service
Te Waipounamu Region



Dr Annabel Begg

Medical Officer of Health
National Public Health Service
Te Waipounamu Region

Contact details

Hebe Gibson
NPHS Te Waipounamu

[Redacted contact information]

²⁰ Alcohol Healthwatch. (2019). Submission to the Ministry of Business, Innovation & Employment on the Buy-Now, Pay-Later discussion document. Accessed from: <https://www.mbie.govt.nz/dmsdocument/18960-alcohol-healthwatch-buy-now-pay-later-submission-pdf>

²¹ O'Brien, L., Ramsay, I., & Ali, P. (2024). Innovation, disruption and consumer harm in the buy now pay later industry: An empirical study. *University of New South Wales Law Journal*, 47(2).



Hospitality New Zealand

**TO
Kaikōura District Council**

**SUBMISSION ON
Local Alcohol Policy Review**

17 September 2026

CONTACT DETAILS: Hospitality New Zealand

Zinnia Foster

Phone:

Email

About Hospitality New Zealand:

1. Hospitality New Zealand (“Hospitality NZ”) is a member-led, not-for-profit organisation representing around 2,500 businesses, including cafés, restaurants, bars, clubs, nightclubs, commercial accommodation, country hotels and off-licences. Our vision is to see hospitality recognised and celebrated for its contribution to Aotearoa, attracting fresh talent and generating sustainable returns for businesses and communities.
2. Hospitality NZ has advocated on behalf of the hospitality and tourism sector for over 120 years. We support and improve the hospitality industry in Aotearoa New Zealand through advocacy, training, connection, and support. We want to create a vibrant, sustainable and thriving hospitality sector that benefits businesses, employees, economies and communities. We aim to empower hospitality businesses with the knowledge, resources, and partnerships they need to succeed and contribute positively to their communities.
3. As the trusted body, we seek to unlock the industry’s full potential as a significant engine for growth in the New Zealand economy and to ensure that the industry’s needs are represented by engaging with the Government and wider industry.
4. This submission relates to the Kaikōura District Council Draft Local Alcohol Policy and accompanying Statement of Proposal.
5. Enquiries relating to this submission should be referred to Zinnia Foster by phone, 027 946 6420, or email, zinnia@hospitality.org.nz. Hospitality NZ wishes to speak in support of this submission at the Council hearing.

General Comments:

6. Hospitality NZ welcomes the opportunity to comment on the Kaikōura District Council’s Draft Local Alcohol Policy (“the draft LAP”). Hospitality and accommodation businesses are central to the social and economic life of the Kaikōura district. They provide employment, anchor the district’s visitor economy – including whale watching and other tourism activities that draw visitors to the town year-round – and offer the safe, supervised environments in which the great majority of alcohol consumption occurs responsibly.
7. We support the object of the Sale and Supply of Alcohol Act 2012 and recognise the Council’s responsibility to minimise alcohol-related harm. Licensed, supervised hospitality venues are part of the solution to that objective, not the problem: they are staffed by trained and certified managers, subject to host responsibility obligations, and accountable through the licensing and enforcement regime. We are broadly supportive of the Council’s evidence-based and proportionate approach, which retains the current trading hours and one-way door settings while introducing new measures for larger events and sensitive site protection. Our specific comments below focus on areas where the draft LAP would affect hospitality operators, both positively and where refinement would support a more workable outcome.

Specific Comments:

Maximum trading hours

8. We support the Council's preferred option to retain the current maximum trading hours for on-licences (8.00 am to 2.00 am), off-licences (8.00 am to 10.00 pm) and club licences (8.00 am to 10.00 pm Sunday to Thursday, and 8.00 am to 12.00 midnight Friday and Saturday), and we oppose any reduction to those hours. As the Statement of Proposal itself records, no Kaikōura-specific evidence was provided to support a reduction, and the District Licensing Committee already retains full discretion to grant more restrictive hours on a case-by-case basis where an individual premises warrants it. That existing flexibility makes a blanket reduction unnecessary, and a reduction would risk unnecessary harm to a district economy that depends heavily on visitor and tourism trade.
9. We support the retention of 24-hour hotel in-bedroom (mini-bar) sales. This is a standard, low-risk provision that reflects the practical realities of commercial accommodation and is important to Kaikōura's visitor economy.

Off-licence numbers

10. We support the Council's position not to introduce a cap on the number of off-licences in the district. Health New Zealand recommended such a cap as part of its feedback on the current Policy, but it has not been carried into the draft LAP or included in the options considered in the Statement of Proposal. We ask that Council confirm, on the record, that no cap on off-licence numbers will be introduced through this review, to provide certainty for existing and prospective off-licence operators and to preserve competition and consumer choice.

One-way door restrictions

11. We do not consider one-way door restrictions to be an effective harm-reduction tool, and we support the Council's preferred option of retaining them as a discretionary condition rather than a mandatory measure. As the Statement of Proposal itself acknowledges, the evidence regarding the effectiveness of one-way door restrictions is mixed. In our experience, preventing patrons from re-entering a venue can simply shift congregation onto the street, where it is harder to manage, rather than reducing harm. They can also unintentionally split up groups of friends who step outside together – for example to smoke, or to move between venues – leaving one person refused re-entry while the rest of the group is inside, which causes avoidable animosity and upset rather than reducing harm. We ask that any one-way door condition continue to be applied only where there is clear, premises-specific evidence of harm, rather than as a default or precautionary measure, and that the Policy not move toward a mandatory district-wide requirement in any future review.

Special licences and events with 400 or more attendees

12. We support the Council's proportionate approach of applying additional requirements only to

special licence events with an anticipated attendance of 400 or more, and we support the requirement for an Alcohol Management Plan for events of this scale. Smaller community events and occasions, many of them run by or in partnership with hospitality operators, should not be subject to the same compliance burden as genuinely large events.

13. We do not support a two-drinks-per-purchase limit being treated as the default or expected measure within an Alcohol Management Plan. Limiting purchases in this way creates congestion at the point of sale, which is itself a crowd-safety risk at large events, and places additional pressure on venue staff who are already managing service speed, identification checks and intoxication monitoring. Standard host responsibility practices – staff, intoxication monitoring and refusal of service, security, and transport options – already exist to manage this risk, and are more targeted and effective than a blanket purchase limit. Policy 2.3 already allows an Alcohol Management Plan to adopt an alternative approach with reasons; we ask that Council confirm reliance on standard host responsibility practices is an acceptable, not exceptional, response.
14. We ask Council to publish indicative guidance on the “alternative arrangements” that will be accepted in place of certified crowd control officers under Policy 2.4. Certified crowd control officers can be scarce and costly to secure in a district the size of Kaikōura, and event organisers – many of them hospitality businesses – need certainty before committing to a venue and budget rather than finding out at a District Licensing Committee hearing. We also ask that Council clarify how “anticipated attendance of 400” will be calculated, whether by ticketed capacity, peak headcount or cumulative attendance, given this figure is the trigger for a material compliance cost.

Location restrictions near sensitive sites

15. We broadly support the Council’s preferred approach of restricting new licences within 100 metres of identified sensitive sites, while exempting the Commercial Zone and existing licensed premises, renewals and substantially unchanged variations. These exemptions appropriately protect sensitive community facilities while maintaining certainty for existing hospitality operators, and we ask that they be retained unchanged in the final Policy.
16. We ask that the definition of “social service provider” in Policy 4.1 be tightened to a defined, publicly identifiable physical facility with a permanent presence. As drafted, the definition is broad enough to capture almost any organisation that delivers counselling, emergency assistance, housing, youth, family violence or mental health support from an address, which risks inadvertently creating exclusion zones around much of the town centre. We also ask that Council publish clear guidance on how the 100-metre separation distance will be measured and assessed – including how the “shortest pedestrian route” between principal entrances is to be determined – so that applicants and their advisors can assess a site’s compliance with confidence before committing to a lease.

Recommendations:

17. In summary, Hospitality NZ recommends that the Council:
 - retain the maximum on-licence, off-licence and club licence trading hours set out in the draft Policy, and the 24-hour provision for hotel in-bedroom sales;

- confirm on the record that no cap on the number of off-licences will be introduced through this review;
- retain one-way door restrictions as a discretionary condition only, applied on premises-specific evidence rather than as a default measure, and not extend it to a mandatory condition in any future review;
- retain the 400-attendee threshold as the trigger for additional special licence requirements, and the associated Alcohol Management Plan requirement;
- confirm that reliance on standard host responsibility practices, rather than a two-drinks-per-purchase limit, is an acceptable response within an Alcohol Management Plan;
- publish indicative guidance on the alternative arrangements that will be accepted in place of certified crowd control officers under Policy 2.4, and clarify how anticipated attendance will be calculated;
- retain unchanged the Commercial Zone exemption and the existing-premises and renewal carve-out in Policy 4.2; and
- tighten the definition of “social service provider” in Policy 4.1 to a defined, publicly identifiable physical facility, and publish clear guidance on measuring the 100-metre separation distance.

Conclusion:

18. We thank Kaikōura District Council for the opportunity to provide input into this consultation. Hospitality and accommodation businesses are proud contributors to the Kaikōura district – to its visitor economy, its community life, and the experience it offers residents and visitors alike. The draft LAP is, in most respects, a sensible and proportionate continuation of the current Policy, and with the amendments recommended above we believe it can achieve the Council’s harm minimisation objectives while supporting a vibrant, sustainable and responsible hospitality sector. We look forward to speaking to this submission at the hearing.



Submission on the Kaikōura District Council Draft Local Alcohol Policy 2026

2 October 2026

Kia ora

Thank you for the opportunity to provide feedback on the Kaikōura District Council Draft Local Alcohol Policy.

We would like the opportunity to speak (virtually) to our submission.

If you have any questions on the comments we have included in our submission, please contact:

Jennifer Lamm

Policy Advisor

Alcohol Healthwatch

T: [REDACTED]

E: [REDACTED]

About Alcohol Healthwatch

Alcohol Healthwatch is an independent national charity working to reduce alcohol-related harm and inequities. We provide a range of regional and national health promotion services such as providing evidence-based information and advice on policy and planning matters, supporting community action projects and coordinating networks to address alcohol-related harm such as the Cross-council Local Alcohol Policy Network.

General Comments

1. Alcohol Healthwatch commends the Council on its commitment to reviewing the 2020 Local Alcohol Policy (LAP), and we wish to acknowledge the efforts of councillors and officers in conducting this review on behalf of communities in the district, and the early engagement with key agents and stakeholders to inform this work¹.
2. We are supportive of policies in LAPs that are aligned to the object of the Sale and Supply of Alcohol Act 2012 (the Act), that reflect the needs of the community, reflect a precautionary approach and are supported by evidence for reducing alcohol-related

harm. While we strongly support the addition of Policy 4 in the draft LAP that may prevent new licenced premises from locating near sensitive sites, we are disappointed that the Council did not take the opportunity to include policies under section 77(1)(a), (b), (d) and (g) of the Sale and Supply of Alcohol Act 2012. We are also disappointed the draft LAP does not follow the current trend with LAPs to reduce trading hours and include discretionary conditions that address emerging issues, such as restrictions on Buy Now Pay Later schemes.

Alcohol-related harm

3. Of all drugs available in our society, alcohol is the most harmful.² The harms of alcohol are far-reaching and deeply felt by many families/whanau and communities particularly in areas of high deprivation.³
4. The cost of alcohol-related harm in Aotearoa has been estimated at over \$9.1 billion annually,⁴ and alcohol is:
 - a leading cause of preventable death, injury⁵ and ill health in Aotearoa New Zealand
 - a component cause for more than 200 disease conditions⁶, including at least seven types of cancer⁷
 - the leading behavioural risk factor for death and disability adjusted life years lost among New Zealanders aged 15 to 49 years⁸
 - a major risk factor for suicide^{9,10} and a contributor to serious mental health problems¹¹, and
 - a significant contributor to the social and health inequities experienced by Māori¹², Pacific peoples and other impacted groups.

Local Alcohol Policies

5. We consider that a LAP:
 - (a) is most effective when implemented as part of a coordinated and comprehensive package of measures to reduce alcohol-related harm that includes alcohol control bylaws¹³, licensing fees¹⁴ and related plans, policies and harm-reduction strategies
 - (b) can improve community well-being by reducing the overall availability and accessibility of alcohol particularly in high-deprivation areas that are disproportionately affected by alcohol harm
 - (c) can provide greater certainty and clarity for the public, licensing bodies, regulatory agencies and licensees¹⁵

- (d) should align with the object of the Sale and Supply of Alcohol Act, prioritise community needs over economic benefits¹⁶, reflect the Supreme Court’s decision on the Auckland LAP¹⁷ including taking a “precautionary approach” to alcohol harm¹⁸, and respond to emerging issues and evolving conditions in the district, and importantly
- (e) can and should incorporate the full range of policies that are set out in section 77(1) of the Act.

Specific comments

Location of Premises

Section 77(1)(a) – Broad Areas

6. This review presents an opportunity to adopt a “broad areas” policy that clearly identifies where licensed premises may be located. A LAP can limit licensed premises to specified “broad areas”, such as commercial or industrial zones, provided the territorial authority has first considered the District Plan and its objectives and policies (section 78(2)(a) of the Act). The policy would complement and reinforce other policies, including policies on the proximity to “sensitive facilities” (section 77(1)(c)) and restrictions on the issuing of further licences (section 77(1)(d)). A broad areas policy would also be consistent with LAPs elsewhere in the Canterbury region¹⁹ and New Zealand.

Section 77(1)(b) – Proximity to Other Premises

7. We recommend a mandatory policy preventing new licensed premises from being located close to other premises with a minimum separation distance of say, 50 or 100 metres of an existing licensed premises. This would help address the harms associated with the clustering of premises, particularly in socio-economically deprived areas that have been shown to have significantly higher concentrations of licensed premises in close proximity than more affluent areas.²⁰
8. High concentrations of licenced premises, particularly off-licences, are associated with shorter travel distances, longer trading hours, and greater price competition^{21,22} thereby increasing the affordability and availability of alcohol and contributing to higher rates of hazardous drinking, crime, and adverse health outcomes.²³ Clustering may also normalise alcohol consumption, increase exposure to marketing and encourage public drinking near outlets,²⁴ all of which national and international evidence links to a range of alcohol-related harms.^{25,26,27,28}

9. We therefore recommend that the LAP include a policy under section 77(1)(b) with a distance requirement as this would help reduce clustering and would be consistent with proximity conditions for licensed premises in other councils' LAPs²⁹.

Section 77(1)(c) - Proximity to Sensitive Sites

10. We support the inclusion of a new policy on sensitive sites, and the distance requirement preventing new licensed premises outside of the Commercial Zone to be within a 100 metres of any school, licensed early childhood education facility, marae, church or other place of regular worship, alcohol and drug treatment facility, or social service provider delivering services to vulnerable persons. The range of sensitive sites is consistent with the majority of current LAPs, with many having additional sites such as community facilities such as playgrounds and parks.
11. There is a need to generally protect vulnerable users of sensitive sites from exposure to off-licence, on-licence and club licence premises and the associated negative amenity effects. Protecting vulnerable populations and users of sensitive sites can also assist to address disproportionate and inequitable exposure to alcohol and experience of alcohol harms.

Section 77(1)(d) – Issuing of Further Licences

12. We recommend that the Council consider a policy on the issuing of further licences as we believe it would reflect community concerns and also align with research on the relationship between the proliferation of licenced premises and accessibility to alcohol and alcohol-related harm.^{30, 31, 32, 33, 34, 35} A policy under section 77(1)(d) enables a cap or sinking lid on licences, and this can halt or reduce the existing numbers of outlets, particularly in areas where licensed premises have reached saturation levels or are located in high socio-deprivation areas.³⁶

Maximum Trading Hours

Section 77(1)(e) – Trading Hours

13. Evidence consistently shows that longer trading hours and greater alcohol availability increase hazardous drinking.^{37,38,39} Shorter hours are therefore an important means of reducing alcohol-related harm and can reduce harmful drinking behaviours such as “pre-loading”, “side-loading” and “post-loading”, and help lessen associated harms such as assault, unintentional injury and drink-driving.⁴⁰

14. This evidence is reflected in the growing number of council LAPs that have had trading hours reduced, particularly for off-licences where more than 80% of alcohol is purchased from, often at low prices. We are therefore disappointed that the draft LAP does not reduce off-licence trading hours and does not follow the advice of the Medical Officer of Health and other agencies to limit off-licence trading to *9 am to 9 pm*, in line with the current trend in LAPs.⁴¹
15. The Supreme Court has confirmed that councils may set trading hours shorter than the Act's default hours.⁴² We therefore strongly recommend reducing trading hours for on-licences, club licence and off-licences.

Discretionary Conditions

Section 77(1)(f) – Discretionary Conditions

16. We support amendments to the discretionary conditions in the current LAP that clarify conditions for special licences. We would also recommend that the LAP include additional conditions that protect children and youth in the district, by not allowing special licences to be granted for family-focussed events, namely those events where a significant proportion of attendees are aged under 18 years. We further recommend that the LAP includes a condition to restrict glass containers at large events.⁴³
17. With regard to off-licences, we strongly recommend that the Council consider the following discretionary conditions including:
 - (a) additional wording in Policy 3.4 to include a restriction on *single sales*, as such sales generally make alcohol affordable and are often linked to hazardous drinking by vulnerable people;
 - (b) additional wording in Policy 3.2 to include *FASD warning signage* within the alcohol area in supermarkets and grocery stores and at point of sale at bottle stores;⁴⁴
 - (c) restrictions on the visibility of *alcohol advertising and product or price promotions*, to reduce children's exposure to alcohol marketing. Exposure to alcohol advertising is a recognised risk factor for alcohol-related harm and is associated with both increased consumption and more frequent alcohol use. Advertising can normalise and glamorise alcohol use, embedding it in everyday life. Children and young people are particularly vulnerable because their developing cognitive abilities make them more susceptible to its influence.⁴⁵ A ban on external advertising can also support Crime Prevention Through Environmental Design (CPTED) principles and other measures by prohibiting external signage that obscures the view into/out of the premises;

- (d) restrictions on *Buy Now, Pay Later (BNPL)*, as these schemes are considered an inappropriate method of payment and subvert established mechanisms to minimise harm to public health from alcohol by enticing the consumer with a much lower upfront price. The research shows that the use of BNPL services to purchase alcohol increases its perceived affordability, which can lead to greater consumption and related harms and facilitates moderate drinkers becoming heavy drinkers, and heavy drinkers transitioning to dependent drinkers. The harm is exacerbated where alcohol is readily available in store (eg outlets in close proximity, long trading hours) and on-line (eg remote delivery). Young adults are among the heaviest drinkers⁴⁶, they are currently the main consumers of BNPL, are also likely to use remote delivery for their purchases (often without ID checks), and this makes them particularly vulnerable;
- (e) requirement for *mandatory age checks* on purchase and delivery, as, for example, research conducted by Alcohol Healthwatch in Tāmaki Makaurau-Auckland showed that in 73% of alcohol orders did not request age verification on delivery; 49% of alcohol orders were left unattended (contactless) at the door; and 87.5% of delivery companies broke their own restricted items policy. Alcohol delivered without an ID check may make it easier for under 18 year olds to access alcohol and increases the chances of hazardous drinking;⁴⁷
- (f) restrictions on the *marketing and promotion of non-alcoholic products* that pose a risk of alcohol-related harm, such as drinking games and risky items that encourage dangerous drinking (eg beer pong cups);

One-way door restrictions

Section 77(1)(g) – One-way Door Policy

18. We support the continuation of a one-way door restriction for hotels and taverns from midnight (Policy 3.3); however, these policies should be mandatory. One-way door restrictions help prevent a large number of people coming out of licensed premises at the same time (as would be the case with a universal maximum closing time) and the potential for intoxicated patrons migrating between venues or interacting with others with an increased likelihood of disorder and crime. These conditions also have the potential to reduce the burden on Police, ambulance and hospital services and can have a positive benefit for not only the patrons of premises but the community generally.

Conclusion

19. Alcohol Healthwatch supports the policies in the draft LAP that have added additional protections for the duration of the policy to address alcohol-related harm. We particularly support the addition of a “sensitive sites” policy. However, we encourage the Council to include the full range of policies in section 77(1) of the Act and also address emerging issues such as Buy Now Pay Later schemes as additional policies that align with Crime Prevention Through Environmental Design principles including restrictions on advertising and marketing. We also strongly recommend that the Council reduces trading hours, particularly for off-licences.
20. Strengthened measures can be effective in meeting the object of the Sale and Supply of Alcohol Act 2012 and reduce the significant burden placed on communities from alcohol-related harm.

References

- 1 Council sought feedback from New Zealand Police, Health New Zealand, and local alcohol licensing and public health officials. Kaikōura District Council Meeting. 26 August 2026 page 81. <https://www.kaikoura.govt.nz/repository/libraries/id:2i17fyhr17q9scmy0d8/hierarchy/Council/Meeting%20Documents/Meeting%20Documents%202026%20%28NB%20All%20Docs%20direct%20linked%20to%20webpage%29/Council%20Meeting%202026/26%20August%202026%20-%20Council%20Meeting%20-%20Agenda%20-%20Final.pdf>
- 2 Crossin, R, Boden, J, Cleland, L et al (2023), The New Zealand Drug Harms Ranking Study: A Multi-Criteria Decision Analysis. *Journal of Psychopharmacology*. <https://journals.sagepub.com/doi/10.1177/02698811231182012>
- 3 Environmental Health Intelligence New Zealand. Alcohol-related harm indicators: <https://ehinz.ac.nz/indicators/alcohol-related-harm/about-alcohol-related-harm/#alcohol-related-harm-indicators>
- 4 The total societal cost of alcohol harms in 2023 is approximately \$9.1 billion based on the increased risk of morbidity and mortality, with over half (\$4.8 billion) due to fetal alcohol spectrum disorder (FASD). New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf
- 5 Alcohol is a significant contributor to interpersonal violence, self-harm (eg suicides), mental health disorders (eg depression), traffic injuries and other harms.
- 6 Rehm J, Baliunas D, Borges GL, *et al*. The relation between different dimensions of alcohol consumption and burden of disease: an overview. *Addiction* 2010; **105**: 817–43.
- 7 There is no safe level of drinking alcohol in relation to cancer. See Cancer Society of New Zealand. No or less alcohol-Waipiro me te matepukupuku. <https://www.cancer.org.nz/cancer/reduce-your-risk-of-cancer/no-or-less-alcohol>.
- 8 Institute for Health Metrics and Evaluation (IHME). GBD Compare Data Visualization 2019, New Zealand. Seattle: WA: University of Washington, 2022. <https://www.healthdata.org/data-visualization/gbd-compare>
- 9 World Health Organization. Preventing suicide: A global imperative. Geneva: World Health Organization, 2014
- 10 Crossin R, Cleland L, Beautrais A, *et al*. Acute alcohol use and suicide deaths: An analysis of New Zealand coronial data from 2007–2020. *New Zealand Medical Journal* 2022;135(1558):65- 78.
- 11 UNICEF. (2020, September). *New Report Card shows that New Zealand is failing its children*. Retrieved from UNICEF: <https://www.unicef.org.nz/stories/new-report-card-shows-that-new-zealand-is-failing-its-children>
- 12 Chambers, Tim; Mizdrak, Anja; Jones, Amanda C.; Davies, Anna; Sherk, Adam (2024). Estimated alcohol-attributable health burden in Aotearoa New Zealand. Health New Zealand. Report. <https://doi.org/10.60967/healthnz.27048892.v1>
- 13 Kaikōura District Council. Control of Alcohol in Public Places Bylaw 2025. <https://www.kaikoura.govt.nz/repository/libraries/id:2i17fyhr17q9scmy0d8/hierarchy/Rules%2C%20Regulations%20and%20Licences/Bylaws%20%28NB%20All%20Docs%20in%20here%20direct%20linked%20to%20Bylaw%20Page%29/Control%20of%20Alcohol%20in%20Public%20Places%20Bylaw%202025.pdf>
- 14 Note: Kaikōura District Council sets licensing fees according to Sale and Supply of Alcohol (Fees) Regulations 2013. However, an increasing number of councils have utilised their bylaw-making powers under the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013 and set fees (usually 100% cost recovery) through this process. <https://www.kaikoura.govt.nz/repository/libraries/id:2i17fyhr17q9scmy0d8/hierarchy/Council/Fees%20and%20charges/Fees%20%26%20Charges%20final%202026-2027.pdf>

- 15 For example, Wellington's hospitality sector has called for a LAP in face of licensing uncertainty. See: Radio New Zealand *Wellington bar owners angry over liquor licensing delays* 18 October 2023. <https://www.rnz.co.nz/national/programmes/ninetoonoon/audio/2018911623/wellington-bar-owners-angry-over-liquor-licensing-delays>
- 16 "It is inherent in a licensing regime, and to be expected given the object of the 2012 Act, that controls may have an adverse economic impact on licensees". *Auckland Council v Woolworths New Zealand Ltd* [2021] NZCA 484 at [41].
- 17 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council and Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [92] <https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf>. The Auckland LAP came into force 16 September and 9 December 2024.
- 18 "We agree... that a precautionary approach is open and that, in any event, a restriction may be justified on the basis of there being a reasonable likelihood that it will reduce alcohol-related harm..." Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council and Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [84] <https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf>
- 19 See other LAPs in the Canterbury region including:
 - Mackenzie, Timaru and Waimate District Councils - no new or further on-licences and off-licences unless located in applicable DP zone or have resource consent;
 - Selwyn District Council – off-licences for stand-alone bottle stores will only be issued for a business that locates in Town Centre Zones (unless DP rule or resource consent);
 - Waimakariri District Council - no new off-licence for new stand-alone bottle store, unless located in Business 1 Zone or Business 2 Zone in DP.
- 20 Hay, G; Whigham, P; Kypri, K; Langley, J. Neighbourhood deprivation and access to alcohol outlets: A national study. *Health & Place*, Volume 15, Issue 4, 1086-1093, 2009. <https://doi.org/10.1016/j.healthplace.2009.05.008>.
- 21 New Zealand Law Commission. Alcohol in Our Lives: Curbing the Harm, 2010. NZLC Report No. 114. <https://www.lawcom.govt.nz/assets/Publications/Reports/NZLC-R114.pdf>.
- 22 Cameron M P, Cochrane W, McNeill K, Melbourne P, Morrison S L, Robertson N. The Impacts of Liquor Outlets in Manukau City Report No. 3: The spatial and other characteristics of liquor outlets in Manukau City. Wellington: Alcohol Advisory Council of New Zealand; 2012. https://www.hpa.org.nz/sites/default/files/imported/field_research_publication_file/ManukauReportSummaryREVISED.PDF
- 23 Sneyd, S., Mu, L. A., Mizdrak, A., Mason, K., & Cameron, M. (September 2, 2025). Invisible alcohol outlets: How data blind spots weaken harm reduction. *Public Health Expert Briefing*. <https://www.phcc.org.nz/briefing/invisible-alcohol-outlets-how-data-blind-spots-weaken-harm-reduction>
- 24 Block RL, Block CR. Space, place and crime: Hot spot areas and hot places of liquor-related crime. *Crime and place*. 1995;4(2):145-84. https://popcenter.asu.edu/sites/default/files/Library/CrimePrevention/Volume_04/07-BlockBlock-3.pdf
- 25 Cameron M, Cochrane W, Livingston M. The relationship between alcohol outlets and harm: A spatial panel analysis for New Zealand, 2007-2014. Wellington: Health Promotion Agency; 2019. <https://apo.org.au/sites/default/files/resource-files/2019-10/apo-nid264526.pdf>
- 26 Popova S, Giesbrecht N, Bekmuradov D, Patra J. Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol & Alcoholism*. 2009;44(5):500-16. <https://doi.org/10.1093/alcalc/agg054>
- 27 Connor JL, Kypri K, Bell ML, Cousins K. Alcohol outlet density, levels of drinking and alcohol-related harm in New Zealand: a national study. *J Epidemiol Community Health*. 2011;65(10):841-6. <https://jech.bmj.com/content/65/10/841.short>

- 28 World Health Organization. A public health perspective on alcohol establishments: licensing, density, and locations. Geneva: World Health Organization; 2022.
<https://www.who.int/publications/i/item/9789240061385>
- 29 See for example Council LAPs: Hauraki District Council (50 metres); Horowhenua District Council (100 metres), Matamata-Piako District Council (100 metres); Waikato District Council (5km for taverns, 1 km for bottle stores); Whanganui District Council (500 metres).
- 30 Cameron MP, Cochrane W, Gordon C, Livingston M. Alcohol outlet density and violence: A geographically weighted regression approach [Internet]. *Drug and alcohol review*. 2016;35(3):280-8: <https://doi.org/10.1111/dar.12295>
- 31 Campbell CA, Hahn RA, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Lawrence B, Middleton JC, Task Force on Community Preventive Services. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms [Internet]. *American journal of preventive medicine*. 2009;37(6):556-69:
<https://doi.org/10.1016/j.amepre.2009.09.028> .
- 32 Hobbs M, Marek L, Wiki J, Campbell M, Deng BY, Sharpe H, McCarthy J, Kingham S. Close proximity to alcohol outlets is associated with increased crime and hazardous drinking: Pooled nationally representative data from New Zealand. *Health & Place*. 2020; 65:1-7.
<https://doi.org/10.1016/j.healthplace.2020.102397>.
- 33 Market Economics Limited (M.E. Consulting). New Zealand Alcohol Supply and Demand Structures: Research report. Wellington: Health Promotion Agency, 2018.
<https://www.hpa.org.nz/sites/default/files/NZ%20Alcohol%20Supply%20and%20Demand%20Structure%20Research%20Report%20FEB2018-Final.PDF> .
- 34 Ayuka F, Barnett R, Pearce J. Neighbourhood availability of alcohol outlets and hazardous alcohol consumption in New Zealand. *Health & Place* [Internet]. 2014;29:186-99.
<https://doi.org/10.1016/j.healthplace.2014.07.002>
- 35 Day P, Breetzke G, Kingham S, Campbell M. Close proximity to alcohol outlets is associated with increased serious violent crime in New Zealand [Internet]. *Australian and New Zealand journal of public health*. 2012;36(1):48-54:
<https://www.sciencedirect.com/science/article/pii/S1326020023017181?via%3Dihub>
- 36 See for example, Tauranga City Council. Local Alcohol Policy 2024. No new licences issued for bottle stores located within suburbs with a social deprivation index of 9 or 10.
- 37 Casswell S, Huckle T, Wall M, Yeh LC. International alcohol control study: pricing data and hours of purchase predict heavier drinking. *Alcoholism: Clinical and Experimental Research* [Internet]. 2014. 38(5):1425-31: <https://doi.org/10.1111/acer.12359>
- 38 Connor, J., MacLennan, B., Huckle, T., Romeo, J., Davie, G., & Kypri, K. (2021). Changes in the incidence of assault after restrictions on late-night alcohol sales in New Zealand: evaluation of a natural experiment using hospitalization and police data. *Addiction*, 116(4), 788-798.
- 39 Nepal S, Kypri K, Tekelab T, Hodder RK, Attia J, Bagade T, Chikritzhs T, Miller P. Effects of extensions and restrictions in alcohol trading hours on the incidence of assault and unintentional injury: systematic review [Internet]. *Journal of studies on alcohol and drugs*. 2020;81(1):5-23:
<https://doi.org/10.15288/jsad.2020.81.5>
- 40 Hahn RA, Kuzara JL, Elder R, Brewer R, Chattopadhyay S, Fielding J, Naimi TS, Toomey T, Middleton JC, Lawrence B, Task Force on Community Preventive Services. Effectiveness of policies restricting hours of alcohol sales in preventing excessive alcohol consumption and related harms [Internet]. *American Journal of Preventive Medicine*. 2010;39(6):590-604:
<https://doi.org/10.1016/j.amepre.2010.09.016>.
- 41 See for example LAPs with 9pm off-licence closing time:
 - Auckland Council LAP <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/policies/local-alcohol-policy.pdf>
 - Central Hawkes Bay District Council LAP <https://www.chbdc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy-2026.pdf>

- Christchurch City Council LAP <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Policies/WEB-Local-Alcohol-Policy-2025.pdf>
 - Dunedin City Council draft LAP 2026 (9am to 9pm) <https://www.dunedin.govt.nz/news-and-events/news/august-2026/consultation-opens-on-proposed-new-local-alcohol-policy>
 - Gisborne District Council LAP [9pm since 5 March 2018] <https://www.gdc.govt.nz/services/alcohol-and-food/local-alcohol-policy>
 - Hastings District Council LAP (9am to 9pm) <https://www.hastingsdc.govt.nz/assets/Documents/LAP/Local-Alcohol-Policy-2025.PDF>
 - Hauraki District Council LAP (8pm) <https://www.hauraki-dc.govt.nz/repository/libraries/id:2jpo4nuxg17q9srdjc4b/hierarchy/Policies/Local-Alcohol-Policy-2025.pdf>
 - Hurunui District Council LAP https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Support_Services/Policies/Alcohol/LAP%202023%20valid%20from%20March%201%202024
 - MacKenzie, Timaru, Waimate District Councils Joint LAP [9pm since 2016] https://www.mackenzie.govt.nz/_data/assets/pdf_file/0006/868074/Local-Alcohol-Policy-adopted-February-2024.pdf
 - Matamata-Piako District Council LAP (9pm since 2017) [https://www.mpdcc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20\(1\).pdf](https://www.mpdcc.govt.nz/filelink/fileman-files/News/HaveYourSay/2023-24%20Policies/LocalAlcoholPolicy2023%20(1).pdf)
 - Porirua City Council LAP (9am to 9pm) - https://storage.googleapis.com/pcc-wagtail-media/documents/Porirua_City_Local_Alcohol_Policy_2025.pdf
 - Selwyn District Council LAP (9pm since 2017) <https://www.selwyn.govt.nz/services/licensing/alcohol/local-alcohol-policy/documents/LAP-final-2025-07-21.pdf>
 - Thames-Coromandel District Council LAP (9pm since 2016) <https://www.tcdc.govt.nz/files/assets/public/v/1/our-council/policies/adopted-local-alcohol-policy.pdf>
 - Wairoa District Council (10am to 9pm) <https://www.wairoadc.govt.nz/assets/Document-Library/Policies/Local-Alcohol-Policy.pdf>
 - Whanganui - <https://www.whanganui.govt.nz/files/assets/public/v/2/policies/2025-local-alcohol-policy.pdf>
- 42 Courts of New Zealand. *Woolworths New Zealand Limited v Auckland Council and Foodstuffs North Island Limited v Auckland Council* [2023] NZSC 45 at [92] <https://www.courtsofnz.govt.nz/assets/cases/2023/2023-NZSC-45.pdf>.
- 43 See, for example, LAPs for Ashburton District Council, Carterton District Council, Dunedin City Council, Gore District Council, Hastings District Council, Mackenzie District Council, Masterton District Council, Napier City Council, Ōtorohanga District Council, Porirua City Council, South Wairarapa District Council, Southland District Council, Tauranga City Council, Timaru District Council, Waikato District Council, Waimate District Council.
- 44 See note 4 above. The societal cost of fetal alcohol spectrum disorder (FASD) has been calculated at \$4.8 billion annually. New Zealand Institute of Economic Research (NZIER). Cost of alcohol harms in New Zealand: Updating the evidence with recent research (2024): www.health.govt.nz/system/files/documents/publications/costs-of-alcohol-harms-in-new-zealand-2may24-v2.pdf.
- 45 The University of Otago *Kids'Cam* research found that New Zealand children aged 11-13 years were exposed to alcohol marketing on average 4.5 times per day. Māori and Pacific children had levels of exposure five and three times greater than European children, respectively. Research undertaken by Alcohol Healthwatch in Tāmaki Makaurau Auckland echoes the Otago University and other studies, and found that 56% of schools had at least one alcohol advertisement within 500 metres; 75% of alcohol advertisements were from nearby licensed premises; 63% of alcohol advertisements were near low decile schools, 66% of schools had one alcohol advertisement in the radius, with the average number of advertisements near schools was two; and 78% of the alcohol advertisements were within 400 metres¹¹ of the schools. See Chambers T, Stanley J, Signal

- L, et al. Quantifying the nature and extent of children's real-time exposure to alcohol marketing in their everyday lives using wearable cameras: Children's exposure via a range of media in a range of key places. *Alcohol* 2018; 53: 626–33. And see Alcohol Healthwatch. Alcohol advertising exposure near schools in Tāmaki Makaurau Auckland. July 2023: <https://pubmed.ncbi.nlm.nih.gov/37856752/>
- 46 Ministry of Health. Annual Update of Key Results 2020/21: New Zealand Health Survey. 2021; published online Dec 1: <https://minhealthnz.shinyapps.io/nz-health-survey-2020-21-annual-data-explorer>.
- 47 Sneyd, S., & Richardson, M. (2024). Online alcohol deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. *The New Zealand medical journal*, 137(1606), 13-21; 29 November 2024: <https://nzmj.org.nz/journal/vol-137-no-1606/online-alcohol-deliveries-age-verification-processes-of-online-alcohol-delivery-companies-in-auckland-new-zealand> and see : Sneyd, S. & Richardson, M. (2024). Alcohol Home Deliveries: age verification processes of online alcohol delivery companies in Auckland, New Zealand. Auckland, New Zealand: <https://www.ahw.org.nz/Portals/5/Resources/Documents-other/2024/Alcohol%20Home%20Deliveries%20HIGH%20DEF.pdf>.